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**PLANNING APPLICATION: DC/18/02412 Planning Application**  
**PROPOSAL: Application for 64 dwellings and new vehicular access at Sproughton**  
**LOCATION: Land on east side of Bramford Road, Sproughton, Suffolk,**  
**APPLICANT: Mr Paul Sutton, Strutt & Parker for Hopkins Homes**  
**PLANNING OFFICER: Ms Gemma Pannell**

Dear Ms Pannell

Thank you for allowing me to comment on the above Reserved Matters Planning Application for the proposed development of up to 64 residential dwellings on land at Bramford Road, Sproughton.

**I have viewed the available outline plans and would like to make the following comments on behalf of Suffolk Constabulary with regards to Section 17 of the Crime and Disorder Act 1998.**

**I hope the applicant applies for Secured by Design accreditation at this site as a means to provide an indication of the quality of the development envisaged.**

It is now widely accepted that a key strand in the design of a 'sustainable' development is its resistance to crime and anti-social behaviour. Based on the area in question, neighbouring sites, evidence of previous criminal and anti-social activity in the locale and examination of all other available factors, my recommendations are made below.

**1.0 I have a number of serious concerns regarding this development, particularly with regard to the type of flying free holds incorporated. On previous applications made by the developers I have seen more preferred flying freeholds that have secure garages incorporated into them, rather than as in the current plans open car port freeholds with rear garaging.**

**1.1 I am seriously concerned for the security of the following plots which have flying freeholds along with rear garaging, at plots 4-5, 13-14, 26-27, 41-42, 44-45, 46-51 and 63-64. I note that the majority of frontages for these properties protrude (pictured right) and have no active surveillance from either the properties concerned or any nearby, so shielding any would be offender from view. Flying freeholds tend to afford no surveillance and it is a proven fact that they are well known as congregating areas for anti-social behaviour, including graffiti, theft and arson. If these plots have to be designed in this manner, I strongly recommend that security gates are fitted. I also recommend photocell dusk to dawn lighting that meets BS5489:2013 lighting standards are placed on the side of buildings looking onto such areas in order to deter any casual intrusions.**

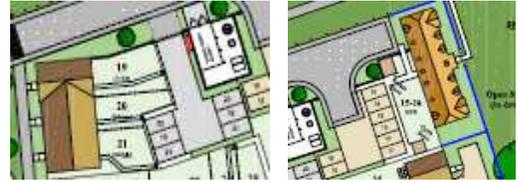


**1.2 I am particularly concerned with the flying freehold for plots 46-51, (pictured right) which incorporates rear parking areas. The police strongly discourage the**



siting of rear parking as time and again it has proved to increase theft of and from vehicles, along with criminal damage, anti-social behaviour and graffiti, as these areas allow an offender to go about undetected due to a lack of any form of surveillance from surrounding properties.

- 1.3 I note that plots 19-21 and the adjacent plots 15-18 also have rear parking, with no surveillance available from any active rooms. For the same reasons previously stated I have concerns that by incorporating such designs they could very well become generators for car crime and anti-social behaviour.



- 1.4 I have concerns that a number of garages are set back from their properties, to allow further car port parking, at plots 1-3, 7-9 and plot 59. Again by having these garages set so far back with no surveillance available from any properties, they heighten the risk that an offender could enter these areas unseen to commit crime.

- 1.5 I have concerns regarding the main front entrance for plots 15-18 which is recessed by the properties protruding either side. Recessed areas obstruct surveillance and allow an offender to remain out of view. These areas can collect windblown litter allowing the opportunity for arson and anti-social behaviour.



- 1.6 I note that at present there are only back gates incorporated for plots 19-21. I trust these gates will have good central mortise locks on them, along with lockable slide bolts top and bottom.

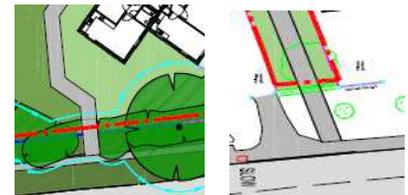
- 1.7 I have serious concerns regarding the incorporation of three elongated alleys, at plot 25 to gain access to plot 24; plot 30 to access plot 29 and at 37 to access plot 36. I would prefer it if these alleyways could be removed especially the one for plot 37, as I feel access could be incorporated from the north western side of plot 36 instead.



- 1.8 Police prefer back to back gardens to increase security and surveillance and reduce the necessity for alleyways that can open up plots to anyone, including thieves. If these alleyways have to be included I strongly recommend that the entrance ways are securely gated and depending on the number of people lawfully accessing them, the gates are either secured, by a key, key fob or combination code.

- 1.9 I have concerns that there is no active surveillance for the parking spaces at the front of plots 31 and plot 38.

- 1.10 I have concerns regarding the entrances for the two additional link footpaths along the southern area of the development, especially the one on the western side, which will have quite dense vegetation around it. If this area is not well maintained with low lying vegetation and not well lit, it could well become a generator for crime to occur.



- 1.11 I also have concerns regarding the main footpaths running all the way along the northern and particularly the southern side of the development. The southern side will have no surveillance from any properties and with all the vegetation along that area, I feel it could be an area for offenders to hide. Using the principles of "Secure By Design New Homes 2016." I urge the developers to make the width of all main communal footpaths at least 3m across to allow people to pass one another without infringing on personal space

and accommodate passing wheelchairs, cyclists and mobility vehicles. Where vegetation is incorporated either side of any footpath, I recommend that it is low growing and regularly maintained, to prevent hiding places for any would be offender. I further recommend that adequate overhead lighting is installed to BS5480:2013 standards. Note bollard lighting is not compliant with Secure By Design principles and BS5489:2013 standards, as it does not give sufficient light at the right height to aid the reduction of the fear of crime as they do not light people's faces sufficiently. (SBD 2016, pages 14-17 at Paras 8.1-8.19 refers).

1.12 I have concerns that including a 1.2/1.8m wall along the perimeter of the parking area for plots 56-58, at either side of plot 56 and 59, will shield offenders from view and allow them ample time to commit vehicle crime undetected.

1.13 There are a number of gable end properties, such as plots 1; plot 5, 9, 12, 19, 22, 25, 27, 36, 40, 44, 46-51, 53, 62 and 64. Of particular concern are plots 9 and 12 by the new allocated footpath; along with plots 19 and 27, 36, 46-51 and 53 by the access drive, where there is no surveillance and by a large area of grass and a tree. These areas can become congregation areas, which can then result in graffiti, anti-social behaviour and criminal damage. Where gable walls are unavoidable there should be a buffer zone, using either a 1.2 – 1.4m railing, or a 1m mature height hedge with high thorn content. (SBD New Homes 2016 refers under "Gable End Walls" at para 12.1- 12.2.2, page 21 refers).



1.14 I note plots 15-18 will have a refuse store and a cycle store. Communal bin storage should conform to SBD New Homes 2016, section 53, page 65, para 54.1-54.3. Cycle storage should conform to SBD Homes 2016 Section 53, pages 64-65, para 53.1-53.4.

1.15 I have concerns with regard to the public open space/meadow area allocated and how it may become a congregation area for anti-social behaviour.

1.16 **Public Open Space:** Such areas should be designed so that they cannot be used as parking areas etc. or an area for motor bikes/peds etc. to ride on. Secure fencing should be considered around the area. A maintenance and management plan should be observed and maintenance vehicle access should be secure.

It is important that the boundary between public and private areas is clearly indicated. Each building needs two faces: a front onto public space for the most public activities and a back where the most private activities take place. If this principle is applied consistently, streets will be overlooked by building fronts improving community interaction and offering surveillance that creates a safer feeling for residents and passers-by.

For the majority of housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1 metre) and railings or timber picket fence.

The balance between permeability and accessibility is always a delicate one. We (policing) want less permeability as it creates entry and escape routes for those who may want to commit a crime. For planners it is about the green agenda, being able to get people from A to B, preferably not in their cars. We cannot demand reductions in permeability without having evidence that this is the only option. What we can do is look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community.

## 2.0 **REFERRALS**

- 2.11 Section 17 of The Crime and Disorder Act 1998 outlines the responsibilities placed on local authorities to prevent crime and disorder.
- 2.12 The National Planning Policy Framework on planning policies and decisions to create safe and accessible environments, laid out in paragraphs 58 and 69 of the framework, emphasises that developments should create safe and accessible environments where the fear of crime should not undermine local quality of life or community cohesion.
- 2.13 **One of the main aims stated in the Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012) at Section 1, para 1.19 under Local Development Framework and Community Strategy states:**

**A safe community:** Protect the environment from pollution, flooding and other natural and man-made disasters; **reduce the level of crime; discourage re-offending; overcome the fear of crime; and provide a safe and secure environment.**

## 2.2 **The Suffolk Design Guide for Residential Areas - Shape of Development – Design Principles (Security)**

Landscaping plays an ever increasing role in making the built environment a better place in which to live. Planted areas have, in the past, been created with little thought to how they affect opportunities for crime. Whilst creating no particular problem in the short term, certain types and species of shrubs when mature have formed barriers where natural surveillance is compromised. This not only creates areas where intruders or assailants can lurk, but also allows attacks on vehicles to take place with little or no chance of being seen. Overgrown planting heightens the fear of crime, which often exceeds the actual risk. Planting next to footpaths should be kept low with taller varieties next to walls.

Where footpaths are separate from the highway they should be kept short, direct and well lit. Long dark alleyways should not be created, particularly to the rear of terraced properties. Where such footpaths are unavoidable they should not provide a through route. Changes in the use of materials can also have an influence in deterring the opportunist thief by indicating a semi-public area where residents can exercise some form of control.

Careful design and layout of new development can help to make crime more difficult to commit and increases the risk of detection for potential offenders, but any such security measures must form part of a balanced design approach which addresses the visual quality of the estate as well as its security. Local Planning Authorities may therefore wish to consult their Local Police Architectural Liaison Officer (now referred to as Design Out Crime Officer (DOCO)) on new estate proposals. Developers should be aware of the benefits obtained from the Secured by Design initiative which can be obtained from the DOCO.

## 2.3 **Department for Transport – Manual for Streets (Crime Prevention)**

The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. Section 17 of the Crime and Disorder Act 1998, requires local authorities to exercise their function with due regard to the likely effect on crime and disorder. To ensure that crime prevention considerations are taken into account in the design of layouts, it is important to consult police Architectural Liaison Officers (Now DOCO's) and crime prevention officers, as advised in *Safer Places*.

To ensure that crime prevention is properly taken into account, it is important that the way in which permeability is provided is given careful consideration. High permeability is conducive to walking and cycling, but can lead to problems of anti-social behaviour if it is only achieved by providing routes that are poorly overlooked, such as rear alleyways.

*Safer Places* highlights the following principles for reducing the likelihood of crime in residential areas (*Wales*: also refer to Technical Advice Note (TAN 129):

- the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal ‘defensible space’;
- access to the rear of dwellings from public spaces, including alleys, should be avoided – a block layout, with gardens in the middle, is a good way of ensuring this;
- cars, cyclists and pedestrians should be kept together if the route is over any significant length – there should be a presumption against routes serving only pedestrians and/or cyclists away from the road unless they are wide, open, short and overlooked;
- routes should lead directly to where people want to go;
- all routes should be necessary, serving a defined function;
- cars are less prone to damage or theft if parked in-curtilage (but see Chapter 8). If cars cannot be parked in-curtilage, they should
- ideally be parked on the street in view of the home.
- Where parking courts are used, they should be small and have natural surveillance;
- layouts should be designed with regard to existing levels of crime in an area; and layouts should provide natural surveillance by ensuring streets are overlooked and well used (Fig. 4.10).

### 3.0 **CONCLUSION**

3.1 I strongly advise the development planners adopt the Approved Document “Q” (ADQ) guidelines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership. Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

3.2 **SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide, namely Gold, Silver or Bronze standards. It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>**

A further downloadable document can be obtained using the following link:

<http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

- 3.3 To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:
- a) All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.
  - b) All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
  - c) Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, **or** STS204 issue 3:2012, **or** LPS1175 issue 7:2010 Security Rating 1, **or** LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

The Police nationally promote Secured by Design (SBD) principles, aimed at achieving a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

3.4 **To reiterate, my main concerns are:**

- a) **Regarding the flying free holds incorporated with rear garaging at plots 4-5, 13-14, 26-27, 41-42, 44-45, 46-51 and 63-64 and mainly have frontages that protrude. (page 1, para 1.1 refers).**

- b) Regarding the flying freehold for plots 46-51, (pictured right) which incorporates rear parking areas. (pages 1-2, para 1.2 refers).
- c) Regarding plots 19-21 and the adjacent plots 15-18 also have rear parking, with no surveillance available from any active rooms. (page 2, para 1.3 refers).
- d) Regarding garages set back from their properties, to allow further car port parking, at plots 1-3, 7-9 and plot 59. (page 2, para 1.4 refers).
- e) Regarding the main front entrance for plots 15-18 which is recessed by the properties protruding either side. (page 2, para 1.5 refers).
- f) That the rear gates incorporated for plots 19-21, will have good locks on them. (page 2, para 1.6 refers).
- g) Regarding the incorporation of three elongated alleys, at plots 25 for 24; plot 30 for 29 and plot 37 for 36. (page 2, para 1.7 refers).
- h) that there is no active surveillance for the parking spaces at the front of plots 31 and plot 38. (page 2, para 1.9 refers).
- i) Regarding the entrances for the two additional link footpaths along the southern area of the development, especially the one on the western side, which will have quite dense vegetation around it. (page 2, para 1.10 refers).
- j) Regarding the main footpaths running all the way along the northern and particularly the southern side of the development. The southern side will not have any surveillance from any properties and has a lot of vegetation all along that area. (pages 2-3, para 1.11 refers).
- k) Regarding including a 1.2/1.8m wall along the perimeter of the parking area for plots 56-58, at either side of plot 56 and 59, will shield offenders from view. (page 3, para 1.12 refers).
- l) Regarding the number of gable end properties, such as plots 1; plot 5, 9, 12, 19, 22, 25, 27,36, 40, 44, 46-51, 53, 62 and 64. Of particular concern are plots 9 and 12 by the main new allocated footpath; plots 19 and 27, 36, 46-51 and 53, by the access drive as there is no surveillance and by a large area of grass and a tree. (page 3, para 1.13 refers).
- m) I hope the communal bin store and cycle store for plots 15-18 will conform to SBD New Homes 2016 standards. (page 3, para 1.14 refers).
- n) With regard to the public open space/meadow area allocated and how it may become a congregation area for anti-social behaviour (page 3, para 1.15 refers).

**If the developers do not intend to adopt Secure By Design standards for the whole development, then I hope they will at least consider such measures for the social housing areas.**

If the planners wish to discuss anything further or need assistance with the SBD application, please contact me on 01284 774141.

Yours sincerely

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